

EXHIBIT V

Estate of Auriel Henderson

VCF Documentation



September 11th
Victim Compensation Fund

July 16, 2020

KEISHA HENDERSON
C/O WENDELL TONG
SULLIVAN PAPAIN BLOCK MCGRATH & CANNAVO, PC
120 BROADWAY 18TH FLOOR
NEW YORK NY 10271

Re: CLAIM NUMBER: VCF0122220

Dear KEISHA HENDERSON:

The September 11th Victim Compensation Fund (“VCF”) has reviewed your claim for eligibility. You submitted a claim form on behalf of AURIEL HENDERSON.

The Decision on your Claim

The VCF has determined that the decedent has met the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center (“WTC”) Health Program, the decedent has been found eligible for the following injuries:

- MALIGNANT NEOPLASM OF UNSPECIFIED OVARY

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

What Happens Next

If the decedent was certified for treatment by the WTC Health Program for a condition not listed above, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

If you believe the decedent had eligible injuries not treated by the WTC Health Program and you would like the VCF to consider those injuries before calculating the amount of any compensation, you should amend your claim. If you choose to amend your claim, you will need to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information about the decedent’s treatment in order to process your claim.



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All forms are available on the VCF website under “Forms and Resources.” The website also includes detailed information and instructions on the Private Physician process.

If the decedent did not have injuries other than those listed above, you should submit the compensation section of your claim form and the required supporting materials if you have not already done so. If you have already submitted this information, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. Please have your claim number ready when you call: **VCF0122220**. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya
Special Master
September 11th Victim Compensation Fund

cc: KEISHA HENDERSON



September 11th
Victim Compensation Fund

August 11, 2020

KEISHA HENDERSON
C/O WENDELL TONG
SULLIVAN PAPAIN BLOCK MCGRATH & CANNAVO, PC
120 BROADWAY 18TH FLOOR
NEW YORK NY 10271

Re: CLAIM NUMBER: VCF0122220

Dear KEISHA HENDERSON:

The September 11th Victim Compensation Fund (“VCF”) has reviewed your claim for compensation. Your claim form was determined to be substantially complete on July 31, 2020. This means your claim was deemed “filed” for purposes of section 405(b)(3) of the Statute on that date.

After reviewing the responses in your claim form, the documents you submitted in support of your claim, and information from third-party entities, the VCF has calculated the amount of your award as [REDACTED]. This determination is in accordance with the requirements of the Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act (“VCF Permanent Authorization Act”). The enclosed “Award Detail” includes a detailed explanation of the calculation and a list of the eligible conditions that were considered when calculating your award.

We did not award lost earnings before Auriel’s death as there is no disability determination, and it appears she was paid for most of 2016. We did not award lost earnings after death as Auriel was 70 years old when she died, and the VCF typically does not award lost earnings in the case of an individual whose earnings loss begins after age 65 years old. We did not award replacement services as we do not compensate for services to adult children, loss of financial support, or loss of management services for rental properties.

No non-routine legal service expenses are approved for reimbursement for this claim.

As the Personal Representative, you are required to distribute any payment received from the VCF on behalf of the victim to the eligible survivors or other recipients in accordance with the applicable state law or any applicable ruling made by a court of competent jurisdiction or as provided by the Special Master.

What Happens Next

The VCF will deem this award to be final and will begin processing the full payment on your claim unless you complete and return the enclosed Compensation Appeal Request Form within **30 days from the date of this letter** as explained below. If you do not appeal, the Special Master will authorize the payment on your claim within 20 days of the end of the 30-



September 11th
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day appeal period. Once the Special Master has authorized the payment, it may take up to three weeks for the United States Treasury to disburse the money into the bank account designated on the VCF ACH Payment Information Form or other payment authorization document you submitted to the VCF.

- **Appealing the Award:** You may request a hearing before the Special Master or her designee if you believe the amount of your award was erroneously calculated, or if you believe you can demonstrate extraordinary circumstances indicating that the calculation does not adequately address your loss. **If you choose to appeal, your payment will not be processed until your hearing has been held and a decision has been rendered on your appeal.**

To appeal the award, you must complete two steps by the required deadlines:

1. Complete and return the enclosed **Compensation Appeal Request Form** within **30 days from the date of this letter**. Follow the instructions on the form and upload it to your claim or mail it to the VCF by the required deadline. If you do not submit your completed Compensation Appeal Request Form within 30 days of the date of this letter, *you will have waived your right to an appeal* and the VCF will begin processing any payment due on your claim.
2. Complete and submit your **Compensation Appeal Package** (Pre-Hearing Questionnaire, Compensation Explanation of Appeal, and all applicable supporting documents) no later than **60 days from the date of this letter**. It is important that you carefully review the information enclosed with this letter and follow the instructions if you intend to appeal your award. Additional instructions on the appeals process can be found on the VCF website under “Frequently Asked Questions” and in the Policies and Procedures available under “Forms and Resources.”

Once your complete Compensation Appeal Package is submitted, the VCF will review the information to confirm you have a valid appeal, and will notify you of the next steps specific to your appeal and the scheduling of your hearing.

- **Notifying the VCF of new Collateral Source Payments:** You must inform the VCF of any new collateral source payments you receive, or become entitled to receive, such as a change to your disability or survivor benefits, as this may change the amount of your award. If you notify the VCF within 90 days of learning of the new collateral source payment, your award will not be adjusted to reflect the new entitlement or payment. If you notify the VCF more than 90 days after learning of the new or revised entitlement or payment, the VCF may adjust your award to reflect the new payment as an offset, which may result in a lower award. If you need to notify the VCF of a new collateral source payment, please complete the “Collateral Offset Update Form” found under “Forms and Resources” on the www.vcf.gov website.

Your award was calculated using our published regulations, and I believe it is fair and reasonable under the requirements of the VCF Permanent Authorization Act. As always, I emphasize that no amount of money can alleviate the losses suffered on September 11, 2001.



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Victim Compensation Fund

If you have any questions, please call our toll-free Helpline at 1-855-885-1555. Please have your claim number ready when you call: **VCF0122220**. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya
Special Master
September 11th Victim Compensation Fund

cc: KEISHA HENDERSON



September 11th
Victim Compensation Fund

Award Detail

Claim Number: VCF0122220
Decedent Name: AURIEL HENDERSON

PERSONAL INJURY CLAIM (Losses up to Date of Death)	
Lost Earnings and Benefits	
Loss of Earnings including Benefits and Pension	\$0.00
Mitigating or Residual Earnings	\$0.00
Total Lost Earnings and Benefits	\$0.00
Offsets Applicable to Lost Earnings and Benefits	
Disability Pension	\$0.00
Social Security Disability Benefits	\$0.00
Workers Compensation Disability Benefits	\$0.00
Disability Insurance	\$0.00
Other Offsets related to Earnings	\$0.00
Total Offsets Applicable to Lost Earnings	\$0.00
Total Lost Earnings and Benefits Awarded	\$0.00
Other Economic Losses	
Medical Expense Loss	\$0.00
Replacement Services	\$0.00
Total Other Economic Losses	\$0.00
Total Economic Loss	\$0.00
Total Non-Economic Loss	
Subtotal Award for Personal Injury Claim	



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DECEASED CLAIM (Losses from Date of Death)	
Loss of Earnings including Benefits and Pension	
Offsets Applicable to Lost Earnings and Benefits	
Survivor Pension	
SSA Survivor Benefits	
Worker's Compensation Death Benefits	
Other Offsets related to Earnings	
Total Offsets Applicable to Loss of Earnings and Benefits	\$0.00
Total Lost Earnings and Benefits Awarded	\$0.00
Other Economic Losses	
Replacement Services	\$0.00
Burial Costs	
Total Other Economic Losses	
Total Economic Loss	
Non-Economic Loss	
Non-Economic Loss - Decedent	
Non-Economic Loss - Spouse/Dependent(s)	
Total Non-Economic Loss	
Additional Offsets	
Social Security Death Benefits	
Life Insurance	
Other Offsets	
Total Additional Offsets	
Subtotal Award for Deceased Claim	



September 11th
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Subtotal of Personal Injury and Deceased Claims	
PSOB Offset	\$0.00
Prior Lawsuit Settlement Offset	\$0.00
TOTAL AWARD	
Factors Underlying Economic Loss Calculation	
Annual Earnings Basis (without benefits)	
Percentage of Disability attributed to Eligible Conditions - applicable to Personal Injury losses	
Start Date of Loss of Earnings Due to Disability - applicable to Personal Injury losses	

Eligible Conditions Considered in Award
Malignant Neoplasm of Unspecified Ovary

Family Member Affidavits

Christina Henderson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

RAYMOND ALEXANDER, et al.,

----- X
**AFFIDAVIT OF CHRISTINA
HENDERSON**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK)
: SS
COUNTY OF KINGS)

Christina Henderson, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at

2. I am currently 42 years old, having been born on [REDACTED].

3. I am the daughter of Decedent, Auriel Henderson upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My mother passed away from ovarian cancer on December 28, 2016, at the age of 70. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My mother was a data processor at DC37. She worked her way up from processor to manager in her department. My mother was a talented and outgoing person with the biggest heart; she had compassion and empathy for everyone. She loved to travel and see things. She went on cruises, boat rides, bus rides, and lobster fests with her sisters and mother, and then with me. She was a vendor who made and sold her own jewelry. She made aids, ribbons, and memorial pillows. She cooked and loved plants. That is one of the things I got from her and one of the things I'll truly miss doing with her. She was a terrific mother, grandmother, and friend. She loved her daughters and all her grandchildren, and she is truly missed. It's unfair that she's not here to be loved by us all.

6. On 9/11, my mother was at work at 125 Barclay Street as usual. That morning, she left at 6:30 am as usual, taking the Q train and transferring to the R train to Rector Street. I had spoken to her earlier that morning. I had a job interview and we planned to meet at Geewiz, which was the diner a block away from her job. When the first plane hit, I was on my way to Manhattan not even knowing what had happened. All the traffic in downtown Brooklyn was at a halt. That's when we heard that the second plane had hit on 1010wins Radio News. At that point, I rushed home to try to call my mother. When I got home, my grandmother, who was her mother, was frantically calling to try to find out where she was and if she was okay. After what seemed like forever, my mother walked into the house covered in dust. She explained that they had to walk over the bridge. She explained how people were pushing and shoving, some people were stepped on, and others grabbed them and helped them across the bridge. When they got to the Brooklyn side of the bridge, people were giving out water and paper towels to help clean them off. Once she got her wind, she started calling to find my sister who worked near her job, and other coworkers and family members that worked at her job. Once she knew my sister and everyone else was okay,

I took her to see her mother who lived in Kingsboro housing in Brooklyn. We were all relieved that everyone was okay.

7. My mother started complaining of constipation. She was a very private woman and didn't really want to discuss everything but living with her I saw the laxatives and suppositories in the medicine cabinet. She drank smoothies and tried fruits and vegetables to help her move her bowels but got very little relief. She started eating Lessard and drinking foods more in liquid form to try to prevent constipation, which she said was very painful and uncomfortable. She traveled less and ate much less because of the pain and constipation. But that never stopped her from going to work. She couldn't vend as much, which was one of her pastimes that she loved. She started to mentally pull away from my sisters and me. She was not the happy woman she once was. By the time they figured out what she had, it was well advanced. She had a colostomy bag, and she did radiation that made her extremely weak and made it almost impossible to eat. She had to do IV treatment at home, which my siter, Keisha, and I administered. She was fighting to live, but the sickness wasn't giving up. It was so sad to watch.

8. I miss going to lobster fests with her, getting her call every morning, cooking with her, and talking with her. I miss the meals on holidays and the matching pajamas for my sisters and me and then my grandchildren. My mother always found a way to make things happen for her girls. She took us on trips to Downey Park and Coney Island. We went to Disney via a bus ride with our church. She showed us how to care for plants and make jewelry. She cared for my father when he was dying of cancer in 1999, as well as her only blood sister who had mental issues and lived with us until she passed away in 2000. She never put them in a home and kept them at home until they passed away. She even cared for her mother who was able to pass away in the only home she knew. My mother was a saint in my eyes and continued to work every day while doing all these things.

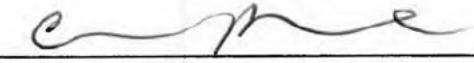
She taught my sisters and me how to love and care for one another and others, and that is one thing that we hold dear to us. Along with her memory, we will carry on and pay it forward to our children. You could never ask for a better mother and friend. It's not fair; she should be here to see her grandchildren grow up and become outstanding individuals. She should be here to travel with her daughters and grandchildren and to spread her love and happiness to the world. Because of hate, she is not here to do so.

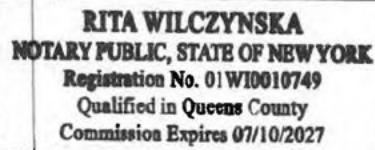
State of New York, County of Queens

Sworn before me this

09th day of September, 2023

Rita Wilczynska
Notary public


Christina Henderson



Keisha Henderson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF KEISHA
HENDERSON**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.
COUNTY OF ESSEX)

Keisha Henderson, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over eighteen years of age, and reside at [REDACTED].
2. I am currently fifty years old, having been born on [REDACTED].
3. I am the daughter of Decedent, Auriel Henderson upon whose death my claims are based. I submit this Affidavit in support of the present motion for a default money judgment for the claim made on behalf of my mother's estate and for my solatium claim. On August 1, 2018, I was issued Letters Testamentary as Executrix of my mother's estate by the Kings County Surrogate's Court.
4. My mother passed away from ovarian cancer on December 28, 2016, at the age of seventy. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My mother worked for DC37 as a computer programmer and worked her way up to a managerial position; she worked there for forty-five years. My mother was everything to me and my sisters; she was kind, thoughtful, strong-willed, and determined. She did everything for us, such as providing us with a home, clothes, food, and love. She never complained about anything when she was sick. You hardly knew when she was sick because she did not complain. She was always at work and barely missed any days. It seemed like she never rested. My mother had a very hard laugh that I can still hear, and I have the same laugh that I love.

I am the oldest, so I can remember things my sisters probably can't. She would take us to Prospect Park, and we would get McDonald's hamburgers and fries before we went in since it was right across the street. We would always find a bench, eat, and then walk around the park. I remember moving into our home in Flatbush, Brooklyn in the early 1980's. It was wintertime, and the house was freezing. She always gave us the best Christmas experience. We always had a large, real tree in our living room, and we each had our own section under the tree where our gifts were placed. When I got older, we would go holiday shopping to places like Woolworth, ODD LOT, ODD JOB, Consumers etc. We would always lug things home, and she was a real trooper. In the house, she always tripped coming up or down the stairs, and we would hear her say, "Oh shit," and we would all laugh. She always managed to make every holiday great. My mother and her mother, my grandmother, were really good cooks. Every holiday, the smell of their great cooking always filled our home. They always went on trips to Atlantic City to gamble and take cruises together. She was absolutely dedicated to her elderly mother and took great care of her until she died at age ninety-three.

My mother was the strongest yet the most loving and caring person I know. She loved animals and was a crafter. She made jewelry and memorial pillows. She also became a street vendor on weekends and holidays. Like I said, she never rested; she did anything to make a dollar. My mother became a grandmother very early on because my sisters had children when they were teenagers. She always supported them and provided whatever was needed. She loved and was proud of her grandchildren. My mother was there for the births of all her grandchildren; she was the first one at the hospital. She always bragged about her “Grands,” as she called them, and they loved Grandma Auriel.

6. We both worked near Ground Zero on 9/11. My mother was working at DC 37, with two entrances at 125 Barclay Street and 140 Park Place. I worked at 195 Broadway for St. Paul Reinsurance. After the first plane hit, I was able to leave on one of the last trains to Brooklyn before they stopped all transits from running that day. My mother wasn’t so lucky; she and her coworkers had to walk over the Brooklyn Bridge, and she was covered in white dust from the towers. I met up with her later at her house. She was so glad to see me. She said she was so worried about me because I had asthma and she didn’t know if I had gotten covered in white dust like she did. I was so glad to know she was okay. She told me about getting covered in white dust from the towers collapsing. A church along the route to the bridge gave out bottled water so people could wash off their eyes. She told me how people were pushing and shoving as they hurried across the Brooklyn Bridge. She said once she crossed the bridge, she walked the rest of the way home. My mother was a plant person, so she had beautiful plants in her cubicle at work. She was worried because no one would water them. Eventually, she and her coworkers returned to work because they were told the air was safe, but it wasn’t.

7. I remember my mother telling me she had difficulty using the bathroom. She went

to the doctor, and they suggested enemas. At the time, my niece, who is her granddaughter, Mia was going to the doctor with her. Mia told her mother, who is my sister, Christina, that cancer was mentioned. That's when we pressed her to tell us what was going on. My mother was very private; she didn't share her feelings. From then on, Valerie or I went with her to her appointments so we would know what was really going on.

My mother would try to eat soft foods, smoothies, and shakes in the hope they would help her go to the bathroom, but they did not help. On March 18, 2015, she had a colonoscopy which showed a large mass in the distal rectum. This was the beginning of her end. She had surgery to remove the mass. I went with her to Memorial Sloane Kettering Hospital for the surgery and waited until the surgery was over. She had to have a total hysterectomy in addition to the mass removal. The doctors had to put in a colostomy bag. I was there for that surgery, too. When she started chemo treatments, my sister, Valerie, and I would take turns taking her to her appointments. Sometimes, my mother travelled by Access-a-Ride, and that was always an awful experience. She always wanted hot chocolate during her treatments. Sometimes, I would bring her Farina hot cereal or a bacon, egg, and cheese sandwich on a roll for her morning appointments. I remember my sister telling me during one appointment on the way home that my mother passed out in the train station. I hated to hear that about my poor mother! No matter what, she always smiled and was never in a bad mood during this whole ordeal.

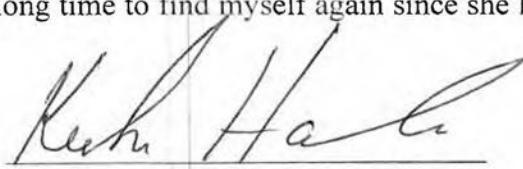
There were two times when I knew she would not beat this. One time was at her last doctor's appointment. She was so tired, and she kept putting her head on the doctor's desk as if she couldn't keep it up. I texted my sister and said, "Oh my God, Mommy's dying." I told them not to call because I was with her. I texted them crying emojis because I couldn't show her my tears. I went into the bathroom and cried. The last time was when my sister and I came to check

on her and we gave her a shower. She handed me her debit card, and my sister, Valerie, and I looked at each other. I knew that meant she had just given me control of her money and property.

8. My mother was our last elder. The loss of my dear mother has taken our family history, our sense of security, and our love. I feel like an orphan. I won't get to hear her advice as a grown woman, as a mother, as my friend. On July 15, 2022, my family was blessed and closed on a beautiful home. It has an inside porch just like the one at my mother's house that we lived in and still own. I know that was a blessing from God to always remember her. I will never be able to invite my mother to my home and have her put her feet up and have tea or a drink with me on the porch. She worked for forty-five years at the same company. She did not get to enjoy her retirement or her Social Security which she accumulated for forty-five years. My mother was creative, made jewelry, was a fair vendor on the weekends and holidays, and loved people and animals. My daughter makes jewelry that is better than what my mother made. My mother would have loved to have my daughter by her side at a fair table selling their jewelry. They said the next generation is supposed to be better than the last. If that is true, I am an awesome mother because mine was truly extraordinary. There are no words that can express the loss of my mother, Auriel Janice Henderson. I can only express who she was to me, which again (she was everything). I smile each and every day I think of her and her rosy cheeks. She called me "Key" and always said, "Give me some sugar," when we left her house, which meant, "Give me a kiss." I was in the bed with her at Memorial Sloane Kettering Hospital when she died. She waited until I went to sleep, then she went. I am so grateful to know when she left her body, she saw me laying there next to her.

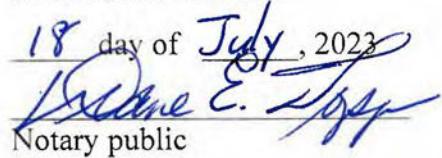
She died on December 18, 2016, three days after Christmas. My husband picked me up from the hospital after she died. He knew my mother well; he said, "Keisha, your mother's spirit came in the car when you did." I was so distraught, I didn't respond. When I got home, my children

still had their Christmas gifts laying around. As I laid down in my bed to process the fact that I just left her body at the hospital, my son's toy car zoomed across the room. I had the presence of mind to say, "Mommy, is that you? If so, do it again," and the car zoomed back across the room. I knew it was her telling me she was okay. My husband later told me he picked up the car and there were no batteries in it, so it truly was my mother. I didn't know how much I equated my life with my mother until she was gone. It's taking me a long time to find myself again since she left, and I am still waiting.



Keisha Henderson

Sworn before me this

18 day of July, 2023

Notary public

DIANE E. TOPPIN
Notary Public, State of New York
Registration No. 01T04795612
Qualified in Nassau County
Commission Expires Sept 8, 2028



Valerie Henderson

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X
RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF VALERIE
HENDERSON**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK)
: SS
COUNTY OF KINGS)

VALERIE HENDERSON, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at

[REDACTED].

2. I am currently 46 years old, having been born on [REDACTED]

3. I am the daughter of Decedent, Auriel Henderson upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My mother passed away from ovarian cancer on December 28, 2016, at the age of 70. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

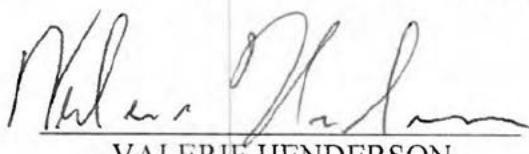
5. Auriel Henderson was my mother. She worked at DC37. My name is Valerie Henderson. I am the second oldest daughter. Some special moments I can remember were on my birthday, which is on Valentine's Day. My mother would always bake me a Watergate cake. It was made from cake mix, Sprite soda, and pistachio pudding mix. The icing for the cake was pistachio pudding mixed with cool whip and walnuts. I love this cake. Another special moment would be all the times we spent playing cards.

6. Auriel Henderson was at work at DC37 on September 11, 2001. I did not live with her on 9/11. I was living at 116A Macon Street. All I remember was waiting for a phone call from my mother and sister, Keisha Henderson. Another thing I remember was that she told me she had to walk over the Brooklyn Bridge and people were pushing and shoving.

7. My mother could not use the bathroom. My mother was very weak and lost a lot of weight. She often refused to eat. I was taking her to chemo treatments. We commuted on the four train after meeting at Prospect Park. There were two incidents where my mother fainted on me. It was devastating seeing her unconscious because I did not know whether she would live or die. Throughout the year, she would get at least three blood transfusions; when they were over, it would be dark and late. We traveled to her house by train. I went home after I dropped her off safely. I recall her saying to me as she got the chemo inside her, she often felt like it was burning.

8. My mother's death has affected me a lot. Sadly, she did not get the luxury of enjoying her life going through her 80's and 90's. I do not have the luxury to talk with her when I need to. I no longer have a partner to play cards with nor knowledge of all her recipes.

Also, she is not here in her grandchildren's lives. No matter what age you are, everyone needs their mother all the time.

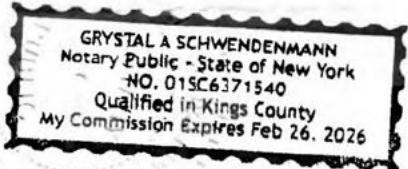


VALERIE HENDERSON

Sworn before me this

24th day of July, 2023

CRYSTAL A. SCHWENDENMANN
Notary public



Andrea Henderson-Lesesne

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

RAYMOND ALEXANDER, et al.,

**AFFIDAVIT OF ANDREA
HENDERSON-LESESNE**

Plaintiffs,

21-CV-03505 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE

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COUNTY OF WASHINGTON D.C.

ANDREA HENDERSON-LESESNE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at

2. I am currently 44 years old, having been born on

3. I am the daughter of Decedent, Auriel Henderson upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.

4. My mother passed away from ovarian cancer on December 28, 2016, at the age of 70. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. My mother worked for DC37 for 45 years as a computer programmer and, years later, was promoted to supervisor. My mother was everything to me and my sisters; she was the most kind and thoughtful person that I have ever known. My mother did everything for me, my sisters, and my father when he was alive. My mother put everyone's needs ahead of her own; she never complained. She was driven and determined. She always managed to find a way to get through and take things to a new level. She made sure we had a computer and a fax machine in our home. She gave us every opportunity to be productive.

6. I was home in Washington, D.C. on the day of 9/11. I just came home from the hospital from giving birth to my son, Elijah E. Everett on September 7th. I remember watching the attacks on the news at home and trying to call my mother and sisters, but the phone lines were all tied up and I kept getting a busy signal. I knew that my mother worked near Ground Zero and went to work on 9/11. She worked at DC 37 located at 10 Park Place. I later found out that after the second plane hit, my mother and her coworkers had to walk over the Brooklyn Bridge. I was told that when my mother got home, she was covered in white dust. I also learned that she was very worried about my older sister, Keisha, because she had really bad asthma and she did not know if Keisha was safe or not.

7. I remember my niece, Mia, telling me that my mother was having difficulty using the bathroom, and she had to go back and forth to doctor's appointments. I moved to Washington, D.C. in 2001 and did not go home on a regular basis because of my work schedule and my kids. My mother came down to D.C. with my niece in 2013 to visit my kids and me, and I almost didn't recognize her. I had never seen my mother look so skinny, frail, and sick before.

8. My son, Alexander L. Lesesne, who was born in January 2020 will be the only

grandchild of my mother's who never got to meet his grandmother. The loss of my mother is the worst thing I have experienced in my life. My kids and I won't get to hear her life stories. My mother was a hard worker; she never got to enjoy her retirement, which she absolutely deserved. If not for this illness, I know my mother would have lived a long life like her mother who lived until she was 93. My mother died on December 28, 2016, three days after Christmas. My sister, Keisha called me and told me to say goodbye before it was too late. I was able to speak to her just in time to tell her that I loved her, and I got to hear her say that she loved me, too, for the very last time in my life.



ANDREA HENDERSON-LESESNE

Sworn before me this

____ day of _____, 2023

Notary public

District of Columbia

Signed and Sworn to (or affirmed) before me on 7/21/2023 (Date)
by Andrea Henderson-Lescard (Name(s) of Individual(s) Making Statement)

Signature of Notarial Officer: 

Title of Office: DC

My Commission Expires: 11/14/2027

